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December 3, 2020

VIA ECF AND EMAIL

(RomanNYSDChambers@NYSDChambers.uscourts.gov)

Honorable Nelson S. Román, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: James Thorpe v. D'Annunzio & Sons, Inc., et. al.
Docket No.: 18-cv-2606 (NSR) (AEK)

Application granted. The Status Conf. is adjourned from Dec. 4, 2020 until July 9, 2021 at 10:00 am. Clerk of Court requested to terminate the motion (doc. 68).

Dated: Dec. 3, 2020

SO ORDERED:

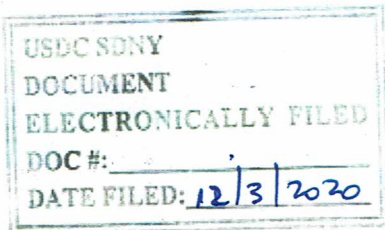

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Dear Judge Román:

This firm represents Defendant, J. D'Annunzio & Sons, Inc. ("D'Annunzio"), in this matter. We write this letter jointly with counsel for Plaintiff, James Thorpe ("Plaintiff"), and Defendant, Laborers' Union Local 17 (the "Union") (collectively, the "Parties"), to respectfully request an adjournment of the status conference presently scheduled before Your Honor on Friday, December 4, 2020.

The reason for the adjournment is that the Parties require additional time to complete discovery and respectfully request that the conference before Your Honor is adjourned until after all discovery is completed. On November 23, 2020, Magistrate Judge Andrew E. Krause issued a Discovery Plan and Scheduling Order extending the discovery end date to June 28, 2021. Accordingly, the Parties have conferred and propose that the conference is adjourned to either Thursday, July 1, 2021; Friday, July 2, 2021; or Thursday, July 8, 2021, or any date thereafter as may be convenient for the Court.

This is the Parties' first request for an adjournment of this status conference and is made on consent. This adjournment request was not made at least 48 hours prior to the scheduled appearance because it was not on the Court's docket and we were advised by the Courtroom Deputy that it may have been inadvertently marked off by the Docketing Department.



Respectfully submitted,
Kaufman Dolowich & Voluck, LLP


Solomon Abramov

Cc: All counsel of record (via email)

MEMO ENDORSED